

## REMARKS

Applicants respectfully request reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1-21 are pending in the present application, with Claims 1, 17, 20, and 21 being independent.

Claims 1 and 17 have been amended. No new matter is believed to have been added.

Claim 21 has been withdrawn. Applicants note that the Office Action asserts that an election was made “without traverse in Paper No. 7.” According to the Examiner, Paper No. 7 was withdrawn in response to a teleconference with the office of Applicants’ attorney. However, it is respectfully submitted that no restriction/election requirement has previously been made of record, and that Applicants have not made any election. Applicants request a written restriction/election requirement setting forth any grounds for imposing such a requirement so that Applicants have an opportunity to respond and to determine any grounds for traversal.

Claim 17 stands rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. Without conceding the propriety of this rejection, Applicants have amended Claim 17 in view of the Examiner’s comments. Applicants submit that Claim 17 now even more fully satisfies the requirements of the second paragraph of 35 U.S.C. §112. Accordingly, reconsideration and withdrawal of the §112 rejection are requested.

Claim 1 stands rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 6,101,073 (“Takehara”). Claims 1-16 and 19-20 stand

rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,046,919 (“Madenokouji”) in combination with U.S. Patent No. 5,523,938 (“Wagner”), and further in combination with U.S. Patent No. 5,706,153 (“Innes”). These rejections are respectfully traversed.

Independent Claim 1 of the invention, as amended, recites a power converting apparatus having a non-insulated converter and a non-insulated inverter. The apparatus includes a controller for varying an input voltage of the converter and/or an intermediate voltage between the converter and the inverter so as to control a potential to ground of a power supply. Independent Claims 17 and 20 respectively recite a solar power generation apparatus and a control method, each generally corresponding to the power converting apparatus of Claim 1.

According to the invention, a potential to ground of a power supply, such as a solar panel, is varied. The invention addresses, for example, problems related to detection of a ground fault such as the problems discussed from page 2, line 27 to page 4, line 26 of the specification.

Takehara relates to an abnormality detection method, abnormality detection apparatus, and solar cell power generating system using the same. Figure 2 of the patent is said to teach the subject matter of Claim 1. However, although Takehara may disclose that an inverter is stopped when a ground fault is detected for a period longer than a time T1, and that the inverter is disconnected from a load such as a commercial power system when the ground fault is continuously detected for a period longer than a time T2 (greater than T1), Applicants submit that Takehara does not teach or suggest at least the feature of the present invention that a controller for varying an input voltage of a non-insulated converter

and/or an intermediate voltage between the converter and a non-insulated inverter so as to control a potential to ground of a power supply. Applicants submit that Claim 1 patentably defines the present invention over Takehara, and respectfully request reconsideration and withdrawal of the §102 rejection.

Madenokouji relates to a solar power generating device. It is said to disclose a power converter and power inverter. The Office Action concedes that the patent does not disclose the utilization of a technique for a ground fault detector, or that a controller records information related to a ground fault in a memory.

The secondary citation to Wagner, which relates to a differential current fault protection for an AC/DC hybrid system and method therefor, is said to disclose utilization of a technique for ground fault detection, and the tertiary citation to Innes, which relates to a programmer for a motor starter, is said to disclose the utilization of a technique for a controller that records information related to a ground fault in a memory.

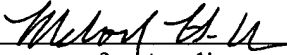
Even assuming, only for the sake of argument, that it would be proper to combine the cited references in the manner suggested by the Office Action, Applicants submit that the proposed combination of Madenokouji, Wagner, and Innes still fails to teach or suggest at least the feature of the present invention discussed above, that is, a controller for varying an input voltage of a non-insulated converter and/or an intermediate voltage between the converter and a non-insulated inverter so as to control a potential to ground of a power supply. In the cited references, an input voltage and/or an intermediate voltage is not varied to detect a ground fault. Applicants submit that Independent Claims 1, 17, and 20 patentably define the present invention over the cited art. Reconsideration and withdrawal of the §103 rejection are respectfully requested.

For the foregoing reasons, Applicants submit that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons that the base claims from which they depend are allowable, and further due to the additional features that they recite. Separate and individual consideration of each of the dependent claims is respectfully requested.

Applicants believe the present Amendment is responsive to each of the points raised by the Examiner in the Office Action and submit that the present application is in allowable form. Favorable consideration of the claims and passage to issue of the present application at the Examiner's earliest convenience are earnestly solicited.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

  
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